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June 22, 2005

## By Electronic Mail

Brad E. Mutschelknaus Edward A. Yorkgitis, Jr. Kelley Drye & Warren, LLP 1200 19<sup>th</sup> Street, N.W., Suite 500 Washington, D.C. 20036

Re:

WC Docket No. 05-65

## Dear Counsel:

On behalf of AT&T Corp., I am writing to request that you submit data relied upon by Professor Simon J. Wilkie in his declaration and in a presentation submitted to the FCC in the above-captioned matter. See Declaration of Simon Wilkie, (dated Apr. 25, 2005); "Proposed Mergers of SBC/AT&T and VZ/MCI: Preliminary Analysis of Competitive Effects," (dated June 14, 2005).

AT&T requests that the following data be submitted: first, the maps on pages 7 to 12 of the report purport to list the number of "lit" CLEC buildings in a particular area. Please provide all data relied upon to derive the number of these CLEC buildings. Second, pages 13 to 15 of the presentation contains charts which purport to describe market share for loops. The source of the charts is described as "GeoResults and Competitive Carrier Lit Building Lists." Please provide the data from GeoResults and the Building Lists. Third, page 18 of Dr. Wilkie's report purports to describe market shares for local transport, and lists as its source "carrier responses to Request for Information issued by a Competitive Provider." Please provide the carrier responses and the request for information. Further, in paragraphs 22 to 26 of his April 26 declaration, Dr. Wilkie discusses bid data that was provided to him. Please submit the bid data. Fourth, on page 22, the presentation mentions "initial regression analyses" of price data. Please provide the price data and the regression analyses.

AT&T requests that you submit on the record in this proceeding the data described above, subject to the terms of the protective order. Please submit the data within 5 business days. Please contact me if you have any questions.

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Sincerely,

Michael J. Hunseder

cc: Lawrence J. Lafaro

David L. Lawson